

430 **FILED**
O'Clock P.M.
JUN 10 2011
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SUPERIOR COURT OF STATE OF ARIZONA
COUNTY OF YAVAPAI

STATE OF ARIZONA,

Plaintiff,

vs.

JAMES ARTHUR RAY,

Defendant.

CASE NO. V1300CR201080049

Hon. Warren Darrow

DIVISION PTB

**DEFENDANT JAMES ARTHUR RAY'S
SUPPLEMENTAL REQUESTED JURY
INSTRUCTIONS REGARDING THE
FIRST AMENDMENT AND VICARIOUS
LIABILITY**

Defendant James Arthur Ray, by and through undersigned counsel, hereby requests that the Court issue the following additional jury instruction in addition to the instructions already proposed.

1 **1. FIRST AMENDMENT**

2 The First Amendment of the United States Constitution protects the freedom of speech.
3 You may not convict Mr. Ray because of the content of his speech or his ideas. You must not be
4 influenced by, or be prejudiced or biased against Mr. Ray because of, the content of his speech or
5 his ideas.
6

7 **2. VICARIOUS LIABILITY**

8 An individual cannot be found guilty of a crime for the acts or omissions of a
9 corporation. If you conclude that James Ray International (JRI), the corporation, engaged in any
10 wrongful conduct, you may not consider that as evidence of Mr. Ray's guilt of the alleged crimes
11 or for any purpose. Similarly, if you conclude that the deaths in this case resulted from the acts or
12 omissions of JRI the corporation, you must find Mr. Ray not guilty of the alleged crimes.
13
14

15 DATED: June 10, 2011

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19
20 By: 

21 Attorneys for Defendant James Arthur Ray
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23 Copy of the foregoing delivered this 10 day of June, 2011, to:

24 Sheila Polk
25 Yavapai County Attorney
26 Prescott, Arizona 86301

27 By: 